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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Mega Newco Limited,¹

Debtor in a Foreign Proceeding

Chapter 15

Case No. 24-12301 (MEW)

**APPLICATION PURSUANT TO FEDERAL RULES
OF BANKRUPTCY PROCEDURE 2002 AND 9007 FOR
ORDER SCHEDULING HEARING AND SPECIFYING FORM AND
MANNER OF SERVICE OF NOTICE, AND GRANTING RELATED RELIEF**

¹ The last four identifying digits of the registered number are 6024 and with registered address at Suite 1, 7th Floor 50 Broadway London SW1H 0DB, United Kingdom.

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Ignacio Javier Gonzalez Delgadillo (the “Petitioner” or the “Foreign Representative”), the foreign representative of the scheme of arrangement (the “Scheme”) proceeding (the “England Scheme Proceeding”) of Mega Newco Limited (“Mega” or the “Debtor”) before the High Court of Justice, Business and Property Courts of England and Wales, Insolvency and Companies List (ChD) (the “English Court”), by and through the undersigned counsel, respectfully submits this application (the “Application”) for the entry of an order (a) scheduling a hearing on the relief sought in the *Verified Petition for (i) Recognition of Foreign Proceeding, (ii) Recognition of Foreign Representative, (iii) Recognition of Sanction Order and Related Scheme and (iv) Related Relief under Chapter 15 of The Bankruptcy Code* (the “Verified Petition”¹) and together with the *Official Form Petition* filed by the Petitioner contemporaneously herewith, the “Petition”); (b) specifying the form and manner of service thereof; and (c) approving the manner of service of any further pleadings that the Petitioner files in this Chapter 15 Case. In support of this Application, the Petitioner respectfully represents as follows:

BACKGROUND

1. The relevant factual background with respect to the relief sought in this Application is set forth in the Verified Petition. The Court may find therein a description of the English Scheme Proceeding of the Debtor and its activities, business, corporate and capital structures, and the circumstances leading to the commencement of the English Scheme Proceeding.

JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and the Amended Standing Order of Reference, *In re Standing Order of Reference Re: Title II*, No. 12 Misc. 00032 (S.D.N.Y. Feb. 1, 2012) (Preska, C.J.) (the “Amended Standing Order”). This

¹ All capitalized terms used but not defined herein shall have the meaning ascribed to them in the Verified Petition.

is a core proceeding under 28 U.S.C. § 157(b). Venue is proper in this District pursuant to 28 U.S.C. § 1410. The statutory predicates for the relief requested herein are section 1515 of the Bankruptcy Code and Rules 1007(a)(4), 2002(l), 2002(m), 2002(p), 2002(q) and 9007 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”).

RELIEF REQUESTED

3. The Petitioner seeks entry of an order, substantially in the form attached hereto as Exhibit A (the “Proposed Order”), (a) setting **December 16, 2024**, or as soon thereafter as the Court’s calendar permits, as the date (the “Recognition and Enforcement Hearing Date”) for the hearing on the relief sought in the Petition (the “Recognition and Enforcement Hearing”); (b) setting **4:00 p.m. (prevailing New York time) on December 9, 2024**, as the deadline by which any responses or objections to the Petition must be received (the “Objection Deadline”); (c) **setting 4:00 p.m. (prevailing New York time) on December 11, 2024**, as the deadline by which any replies in support of the Petition must be received (the “Reply Deadline”); (d) approving the form of notice (the “Notice”), attached hereto as Exhibit B, of: (i) the Recognition and Enforcement Hearing Date, (ii) the Objection Deadline, and (iii) the Debtor’s intent to rely on foreign law, namely English Bankruptcy Law and related English insolvency law; (e) approving the manner of service of the Notice described herein; (f) approving the manner of service consistent with Bankruptcy Rule 2002(q) of any further pleadings that the Petitioner files in this Chapter 15 Case; and (g) granting related relief.

4. Specifically, the Petitioner proposes to (i) within three (3) business days of the entry of the Proposed Order, serve the Notice and the Petition (collectively, the “Notice Documents”) by United States mail, first-class postage prepaid (or equivalent service) upon the parties (the “Notice Parties”) identified in Exhibit C hereto in accordance with Bankruptcy Rule 2002(k) and

(q) and Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of New York (the “Local Rules”) 2002-1, 9006-1(b) and 9013-1(b) and (ii) pursuant to Section 10.01 of the Existing Notes Indenture (i) publish the Notice documents in English on the website of on the website of SGX-ST (ii) provide the Notice Documents to the Existing Notes Trustee² with instructions to forward the Notice Documents on behalf of the Petitioner to the Depository Trust Company (the “DTC”), in its capacity as the record holder of the Existing Notes (together with any of its affiliated entities as applicable) and to instruct the DTC to disseminate the same according to the DTC’s customary practices.

BASIS FOR RELIEF

5. Bankruptcy Rule 2002(q)(1) provides that the debtor, all persons authorized to administer the foreign proceedings of the debtor, all entities against whom provisional relief is sought, all parties to litigation in the United States to which the debtor is a party and “such other entities as the court may direct” must be given at least twenty-one days’ notice of the hearing on the petition for recognition of a foreign proceeding. Fed. R. Bankr. P. 2002(q)(1). Bankruptcy Rules 2002(m) and 9007 provide, among other things, that when notice is to be given under the Bankruptcy Rules, the court shall designate the form and manner in which such notice shall be given (provided the Bankruptcy Rules do not otherwise specify the appropriate form and manner of such notice). Fed. R. Bankr. P. 2002(m), 9007. Although Bankruptcy Rule 2002(q) provides that the parties identified therein must receive at least twenty-one days’ notice by mail of the hearing on the petition for recognition of a foreign proceeding, it does not specify the form and manner in which such notice must be given.

² All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Verified Petition.

6. The Petitioner respectfully submits that its proposed service of the Notice Documents by United States mail, first-class postage prepaid (or equivalent service) constitutes adequate and sufficient notice of this Chapter 15 Case, the relief sought in the Petition, the time fixed for filing objections to the relief sought in the Petition, and the time, date, and place of the Recognition and Enforcement Hearing. Further, service by the Petitioner of all further pleadings that it files in this Chapter 15 Case by United States mail, first class postage prepaid (or equivalent service), on the Notice Parties is an efficient and effective way to provide notice to such parties.

7. Accordingly, the Petitioner respectfully requests that this Court approve the foregoing manner of notice and service of the Notice Documents pursuant to Bankruptcy Rules 2002(l), 2002(m), 2002(q) and 9007.

8. Bankruptcy Code section 1517(c) provides that a petition for recognition shall be decided “at the earliest possible time.” 11 U.S.C. § 1517. Moreover, Bankruptcy Rule 1012(b) provides that a party objecting to a petition filed to commence an ancillary proceeding under chapter 15 of the Bankruptcy Code has until seven days before the date set for hearing to respond, unless the court orders otherwise. *See* Fed. R. Bankr. P. 1012(b). Finally, Bankruptcy Rule 2002(q)(1) provides that parties are to be given twenty-one (21) days notice of a hearing on a chapter 15 petition. *See* Fed. R. Bankr. P. 2002(q)(1). In light of these requirements, the Petitioner respectfully submits that setting (i) December 16, 2024 (or as soon thereafter as the Court’s calendar permits) as the Recognition and Enforcement Hearing Date and (ii) December 9, 2024, at 4:00 pm (prevailing New York time) as the Objection Deadline is appropriate.

9. Local Rule 9006-1(b) provides that any reply papers in support of a motion shall be served so as to ensure actual receipt no later than 4:00 p.m. three (3) days before the hearing

date. In light of this requirement, the Petitioner respectfully submits that setting December 11, 2024, at 4:00 p.m. (prevailing New York time) as the Reply Deadline is appropriate.

10. Section 1514(c) of the Bankruptcy Code provides that when notification of the commencement of a case is to be given to foreign creditors, such notification shall, *inter alia*, indicate the time period for filing proofs of claim, specify the place for filing such proofs of claim and indicate whether secured creditors need to file proofs of claim. 11 U.S.C. § 1514(c). Given that section 1514(c) does not appear to apply in this Chapter 15 Case (as the Debtor has not sought to commence a case under any other chapter of the Bankruptcy Code), the Petitioner respectfully requests that the requirements contained therein be waived in this instance. Courts in this district have granted such requests. *See* Order Pursuant to Federal Rules of Bankruptcy Procedure 2002 and 9007 Scheduling Hearing and Specifying Form and Manner of Service and Notice, *In re Odebrecht Engenharia e Construção S.A.*, No. 20-12741 (Bankr. S.D.N.Y. Nov. 25, 2020), ECF No. 10; Order Pursuant to Federal Rules of Bankruptcy Procedure 2002(m) and (q) and 9007 Scheduling Hearing and Specifying Form and Manner of Service and Notice, *In re Oi S.A.*, No. 16-11791 (Bankr. S.D.N.Y. June 22, 2016), ECF No. 21; Order Pursuant to Federal Rules of Bankruptcy Procedure 2002(m) and (q) and 9007 Scheduling Hearing and Specifying Form and Manner of Service and Notice, *In re Serviços de Petróleo Constellation S.A.*, No. 18-13952 (Bankr. S.D.N.Y. Dec. 11, 2018), ECF No. 26; Order (I) Scheduling Hearing Regarding Verified Chapter 15 Petition, and (II) Specifying Form and Manner of Service of Notice, *In re Upper Deck Int'l B.V.*, No. 12-14294 (Bankr. S.D.N.Y. Oct. 18, 2012), ECF No. 8. Because the claims process will be handled through the English Scheme Proceeding, waiving these requirements and allowing foreign claims to be heard in the English Scheme Proceeding is consistent with principles of comity and cooperation among courts, as well as the ancillary nature of this Chapter 15 Case.

NOTICE

11. Notice of this Application has been provided to the Notice Parties defined above and identified on Exhibit C hereof. The Petitioner submits that no other or further notice need be provided.

NO PRIOR REQUEST

12. No previous request for the relief requested herein has been made to this or any other court.

CONCLUSION

WHEREFORE, the Petitioner respectfully requests that this Court: (a) enter an order, substantially in the form of the Proposed Order attached hereto as Exhibit A, granting the relief requested herein; and (b) grant such other and further relief as the Court deems just and proper.

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Dated: November 25, 2024
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ David H. Botter
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*Attorneys for the Foreign Representative
of Mega Newco Limited*

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Mega Newco Limited,¹

Debtor in a Foreign Proceeding

Chapter 15

Case No. 24-12031 (MEW)

**ORDER PURSUANT TO FEDERAL RULES OF
BANKRUPTCY PROCEDURE 2002 AND 9007 SCHEDULING
HEARING AND SPECIFYING FORM AND MANNER OF SERVICE AND NOTICE**

Upon the Application² of Mr. Ignacio Javier Gonzalez Delgadillo, the foreign representative of the scheme of arrangement (the “Scheme”) proceeding (the “England Scheme Proceeding”) of Mega Newco Limited (“Mega” or the “Debtor”) before the High Court of Justice, Business and Property Courts of England and Wales, Insolvency and Companies List (ChD) (the “English Court”) pursuant to Part 26 of the Companies Act 2005 (as amended or re-enacted from time to time, the “Companies Act”) of the laws of England and Wales, by and through his undersigned counsel, for the entry of an order (a) scheduling a hearing on the relief sought in the *Verified Petition for (i) Recognition of Foreign Proceeding, (ii) Recognition of Foreign Representative, (iii) Recognition of Sanction Order and Related Scheme and (iv) Related Relief under Chapter 15 of The Bankruptcy Code* (the “Verified Petition” and together with the *Official Form Petition* filed by the Petitioner contemporaneously herewith, the “Petition”); (b) specifying the form and manner of service of notice thereof; and (c) approving the manner of service of any further pleadings filed by the Petitioner in this Chapter 15 Case,

IT IS HEREBY ORDERED THAT:

¹ The last four identifying digits of the registered number are 6024 and with registered address at Suite 1, 7th Floor 50 Broadway London SW1H 0DB, United Kingdom.

² Any capitalized term not defined herein shall have the meaning ascribed to such term in the Application.

1. The Application is GRANTED.
2. The Recognition and Enforcement Hearing shall be held before this Court via teleconference on _____, 2024 at __:__.m. (prevailing New York time).
3. The form of the Notice attached as Exhibit B to the Application is hereby approved.
4. Prior to serving the Notice or causing it to be served, the Petitioner may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further non-material, non-substantive changes as the Petition deems necessary or appropriate.
5. The Petitioner has provided sufficient notice that the Petitioner plans to raise issues of foreign law to the extent necessary to grant recognition to the English Scheme Proceeding.
6. The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of this Chapter 15 Case or are hereby waived.
7. Copies of the Notice Documents shall be served by United States mail, first-class postage prepaid (or equivalent service), upon the Notice Parties within three (3) days of entry of this Order.
8. Copies of the Notice Documents shall be published English on the website of on the website of SGX-ST.
9. Copies of the Notice Documents shall be provided the Notice Documents to the Existing Notes Trustee³ with instructions to forward the Notice Documents on behalf of the Petitioner to the Depository Trust Company (the “DTC”), in its capacity as the record holder of the Existing Notes (together with any of its affiliated entities as applicable) and to instruct the DTC to disseminate the same according to the DTC’s customary practices.

³ All capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Verified Petition.

10. In the event any party files a notice of appearance in this Chapter 15 Case subsequent to the Petitioner's initial service of the Notice Documents as provided for in this Order, the Petitioner will serve, or cause to be served on such party, the Notice Documents and any subsequent notices upon that party within three (3) business days of the filing of the notice of appearance, if such documents have not already been served on such party (or its counsel). Subsequent notices shall be served in the form and manner set forth in this Order or as otherwise required by the Bankruptcy Code and Bankruptcy Rules.

11. Responses or objections, if any, to the Petition shall be made in writing and shall set forth the basis therefor, and such responses or objections must be: (i) filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov), and a hard copy of such response or objection to be sent to the Chambers of the Honorable Judge Michael E. Wiles, United States Bankruptcy Judge, and (ii) served upon (A) Cleary Gottlieb Steen & Hamilton LLP, One Liberty Plaza, New York, New York 10006-1470 (Attn: David Botter, Thomas S. Kessler), counsel to the Petitioner, and (B) Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn: Adam Goldberg, Jon Weichselbaum), counsel to the Ad Hoc Group, so as to be received on or before **4:00 p.m. (prevailing New York time) (prevailing New York time) on _____, 2024.**

12. The Petitioner's reply, if any, to any response or objection to the Petition shall be made in writing and shall set forth the basis therefor, and such responses or objections must be: (i) filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing,

Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov), and a hard copy of such response or objection to be sent to the Chambers of the Honorable Judge Michael E. Wiles, United States Bankruptcy Judge, and (ii) served upon each party or, if represented by counsel, upon such party's counsel, that filed any response or objection so as to be received on or before 4:00 p.m. (prevailing New York time) on _____, 2024.

13. Any further pleadings by the Petitioner in this Chapter 15 Case shall be served on the Notice Parties.

14. Service and notice of the Notice Documents in accordance with this Order is hereby approved as adequate and sufficient service and adequate notice of the Recognition and Enforcement Hearing on all interested parties. Notice provided in accordance with this Order satisfies the requirements of the Bankruptcy Code and Bankruptcy Rules, including Bankruptcy Rules 2002(p) and (q). No other or further notice is required. Notwithstanding any provision in the Bankruptcy Code, the Bankruptcy Rules or the Local Rules to the contrary, including, but not limited to Local Rule 9078-1, the Petitioner shall file the certificate of service of the Notice Documents in advance of the Recognition and Enforcement Hearing.

15. The Petitioner is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

16. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry

17. The Court shall, and hereby does, retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation or enforcement of this Order.

Dated: _____, 2024
New York, New York

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT B

Form of Notice

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Mega Newco Limited,¹

Debtor in a Foreign Proceeding

Chapter 15

Case No. 24- [•]

**NOTICE OF FILING AND HEARING ON VERIFIED PETITION
UNDER CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE
AND NOTICE PURSUANT TO FED. R. BANKR. P. 9017 AND FED R. CIV. P. 44.1**

PLEASE TAKE NOTICE, that on November 25, 2024, the foreign representative and its affiliated debtor in this Chapter 15 Case (“Mega” or the “Debtor”)² in the Debtor’s proceeding (the “English Scheme Proceeding”) before the High Court of Justice, Business and Property Courts of England and Wales, Insolvency and Companies List (ChD) (the “English Court”) pursuant to Part 26 of the Companies Act 2005 (as amended or re-enacted from time to time, the “English Bankruptcy Law”) of the laws of England and Wales, by and through his undersigned counsel, sought entry of orders (a) scheduling a hearing on the relief sought in the *Verified Petition for (i) Recognition of Foreign Proceeding, (ii) Recognition of Foreign Representative, (iii) Recognition of Sanction Order and Related Scheme and (iv) Related Relief under Chapter 15 of The Bankruptcy Code* (the “Verified Petition” and together with the *Official Form Petition* filed by the Petitioner contemporaneously herewith, the “Petition”); (b) seeking recognition of such foreign proceeding as a “foreign main proceeding” and relief in aid of the English Scheme Proceeding in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) with respect to the Debtor and (c) seeking and order giving full force and effect to the Scheme and Sanction Order in the United States.

PLEASE TAKE FURTHER NOTICE that a copy of the Official Form Petition is attached hereto, along with: (i) the lists required to be filed with the Petition pursuant to Bankruptcy Rule 1007(a)(4) and the statement of the Debtor’s foreign representative under section 1515(c) of the Bankruptcy Code; (ii) the declaration of the Debtor’s foreign representative of the foreign proceeding required to be filed pursuant to Bankruptcy Code section 1515; (iii) the Verified Petition; and (iv) the Declaration the Debtor’s English Counsel (collectively the “Supporting Documents”).

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court has scheduled a hearing (the “Recognition and Enforcement Hearing”) to consider the relief requested in the Petition for _____, **2024 at __: __.m. via teleconference.**

Copies of the Petition and all accompanying documentation are available to parties in interest on the Bankruptcy Court’s Electronic Case Filing System, which can be accessed from the Bankruptcy Court’s

¹ The last four identifying digits of the registered number are 6024 and with registered address at Suite 1, 7th Floor 50 Broadway London SW1H 0DB, United Kingdom.

² Any capitalized term not defined herein shall have the meaning ascribed to such term in the Application or the Verified petition, as applicable.

website at <http://www.nysb.uscourts.gov> (a PACER login and password are required to retrieve a document) or upon written request to the Petitioner's counsel (including by facsimile or electronic mail) addressed to:

Cleary Gottlieb Steen & Hamilton LLP

One Liberty Plaza
New York, New York 10006-1470
Tel: (212) 225-2000
Fax: (212) 225-3999
Attn: David H. Botter
Thomas S. Kessler
(dbotter@cgsh.com)
(tkessler@cgsh.com)

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response or objection to the Petition or the relief requested therein must do so in writing and in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, setting forth the basis therefor, which response or objection must be filed electronically with the Court on the Court's electronic case filing system in accordance with and except as provided in General Order M-399 and the Court's Procedures for the Filing, Signing and Verification of Documents by Electronic Means (copies of each of which may be viewed on the Court's website at www.nysb.uscourts.gov). A hard copy of any response or objection shall be sent to the Chambers of the Honorable Judge Michael E. Wiles United States Bankruptcy Judge, One Bowling Green, New York, New York 10004-1408 and served upon (i) Cleary Gottlieb Steen & Hamilton LLP (Attn: Thomas S. Kessler), counsel to the Petitioner, and (ii) Latham & Watkins LLP, 1271 Avenue of the Americas, New York, New York 10020 (Attn: Adam Goldberg, Jon Weichselbaum), counsel to the Ad Hoc Group, so as to be **received by no later than 4:00 p.m. (prevailing New York time) on _____, 2024 (the "Objection Deadline")**.

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petition or the request for relief contained therein must appear at the Recognition and Enforcement Hearing at the time and place set forth above.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Petition without further notice.

PLEASE TAKE FURTHER NOTICE that the Recognition and Enforcement Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.

PLEASE TAKE FURTHER NOTICE, that, pursuant to Local Rule 2002-4, at the Hearing the Bankruptcy Court may order the scheduling of a case management conference to consider the efficient administrative of this Chapter 15 Case.

PLEASE TAKE FURTHER NOTICE that in the course of this Chapter 15 Case, the Company may raise issues under the Companies Act.

Dated: November 25, 2024
New York, New York

CLEARY GOTTlieb STEEN & HAMILTON LLP

By: /s/ David H. Botter
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*Attorneys for the Foreign Representative
of Mega Newco Limited*

EXHIBIT C

Notice List

No.	Notice Party Name	Notice Party Address
1.	MEGA NEWCO LIMITED	Suite 1, 7th Floor 50 Broadway, London, United Kingdom, SW1H 0DB Attn: Ignacio Gonzalez Email: Ignacio.Gonzalez@gfmega.com
2.	OPERADORA DE SERVICIOS MEGA, S.A. DE C.V., SOFOM, E.R.	Av. Patria 1501, Jardines Universidad, 45110 Zapopan, Jalisco, México Attn: Ignacio Gonzalez Email: Ignacio.Gonzalez@gfmega.com
3.	WILMINGTON TRUST, NATIONAL ASSOCIATION	50 South Sixth Street, Suite 1290, Minneapolis, MN 55402, United States of America Attn: Barry Ihrke Email: barry.irhke@usbank.com
4.	UMB BANK, N.A.	100 William Street, Suite 1850, New York, NY 10038, United States of America Attn: Ray Haniff Email: Ray.haniff@umb.com
5.	CLEARY GOTTLIEB STEEN & HAMILTON LLP	2 London Wall Place, London EC2Y 5AU, England Attn: Polina Lyadnova Email: plyadnova@cgsh.com
6.	MIJRARES, ANGOITIA, CORTÉS Y FUENTES	Javier Barros Sierra 540, 4to piso, Park Plaza I, Colonia Santa Fe, Alcaldía Álvaro Obregón, C.P. 01210, Ciudad de México, México Attn: José Pellón Martínez Email: jjpellon@macf.com.mx
7.	LATHAM & WATKINS LLP	99 Bishopsgate, London EC2M 3XF, United Kingdom Attn: Jonathan Ifeanyichukwu Akinluyi Email: Jonathan.Akinluyi@lw.com
8.	SAINZ ABOGADOS	Blvd. Manuel Ávila Camacho 24 - Piso 21 Lomas de Chapultepec 11000 CDMX, México Attn: Alejandro Sainz Email: asainz@sainzmx.com
9.	TECNOLOGIAS CUENTAS POR COBRAR S.A.P.I. DE C.V.	Blvd. Adolfo Lopez Mateos 2235, Piso 8, Col. Flor de Marfa, Alvaro Obregon, 01710, CDMX, México Attn: Marvin Palavicini Email: mpalavicini@cxc.com.mx
10.	REED SMITH LLP	1201 North Market Street Suite 1500 Wilmington, DE 19801-1163, United States of America Attn: Kurt F. Gwynne; Jason D Angelo Email: KGwynne@ReedSmith.com; JAngelo@reedsmith.com
11.	CIBANCO, S.A., INSTITUCION DE BANCA MULTIPLE	Plaza Campos Eliseos 1, Calz. Gral. Mariano Escobedo 595, Polanco V section, Miguel Hidalgo, CDMX, 11560, México Attn: Delegado Fiduciario a cargo del CIB/4475 Email: instruccionesmexico@cibanco.com; creus@cibanco.com; nmejia@cibanco.com

12.	HOLLAND & KNIGHT LLP	Holland & Knight LLP, 787 Seventh Avenue, 31st Floor, New York, New York 10019, United States of America Attn: Michael Fruchter Email: Michael.Fruchter@hklaw.com
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